



SENT VIA EMAIL

November 19, 2021

Charlene Spells
Ethylene Oxide Commercial Sterilization Section 114 Survey Response
U.S. EPA Office of Air Quality Planning and Standards
Sector Policies and Programs Division, Fuels and Incineration Group
Mail Code E143-05
109 T.W. Alexander Drive
Research Triangle Park, NC 27711

Re: Clean Air Act Section 114 Request dated September 13, 2021

Dear Ms. Spells:

Becton, Dickinson & Company ("BD") is in receipt of the U.S. Environmental Protection Agency's ("EPA") Clean Air Act (CAA) Section 114 Information Request ("CAA Section 114 Request") dated September 13, 2021, for the collection of information related to hazardous air pollutant emissions at ethylene oxide ("EtO") commercial sterilization facilities and requires that the requested information be submitted to EPA by November 19, 2021.

As previously communicated via email on November 5, 2021, BD first became aware of the CAA Section 114 Request at a meeting with EPA Region 8 and the Utah Department of Air Quality which was held on November 4. The CAA 114 Request had been mailed to the former V.P. of EHS & Sustainability, Ellen Kondracki, at BD's corporate headquarters in Franklin Lakes, NJ. Ms. Kondracki, however, resigned her position with BD in July and BD's corporate headquarters had not yet fully re-opened after COVID-19 until November. As a result of these circumstances, the CAA Section 114 Request had not been opened and reviewed in a timely manner.

As noted in the CAA Section 114 Request, on December 9, 2019, EPA issued an initial CAA Section 114 Request to BD, and BD subsequently provided detailed information to EPA on BD's EtO sterilization facilities and provided extensive information on EtO emissions. In addition, BD and EPA, along with EPA's contractor RTI, have engaged in lengthy technical meetings to discuss and analyze BD's sterilization facilities, past and present EtO use, and BD's technical EtO research projects.

Attached to the email transmitting this letter is certain additional information developed since BD's response to EPA's initial request. As discussed during our conference call on November 17, 2021, BD will also be submitting additional information after November 19, 2021, given the challenges in processing the CAA Section 114 Request. BD appreciates EPA's consideration of the circumstances which have resulted in BD being unable to submit a complete response to the CAA Section 114 Request by the November 19, 2021, deadline.

1 Becton Drive
Franklin Lakes, NJ
07417

bd.com

Please feel free to contact me with any questions or comments regarding this matter at 862-232-3523 or Matthew.Garamone@bd.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthew D. Garamone", with a long horizontal flourish extending to the right.

Matthew D. Garamone
Assitant General Counsel – Regulatory Law
Regulatory Legal – Environmental, Health & Safety